

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

THE ESTATE OF LAURA RATLEY,)
by and through its duly appointed special)
administrator Robert Ratley; LEAH)
RATLEY; THE ESTATE OF)
REBECCA FULCHER, by and through)
its duly appointed special administrators)
John Fulcher and Amy Fulcher and)
RYAN FULCHER,)
Plaintiffs,)
v.) Case No. CIV-19-265-PRW
DHAFER M. AWAD and SHAMROCK)
FOODS COMPANY, an Arizona)
Limited Liability Company,)
Defendants.)

PLAINTIFFS' SUPPLEMENTAL DISCLOSURE OF EXPERT WITNESSES

COMES NOW Plaintiffs and pursuant to F.R.C.P. 26 and this Court's Order [Dkt. 185] hereby supplement their expert witness disclosures [Dkt. 113] and supplement Plaintiffs' initial disclosures as well as all Plaintiffs' discovery responses. Plaintiffs reserve the right to supplement this Expert Witness Disclosure as discovery progresses and additional information is obtained. Defendants produced 110 pages yesterday of Defendant Awad's personnel file (Shamrock 1543-1653) and a Shamrock Accident Policy consisting of 13 page (Shamrock 1654-1667) and such information has not been fully reviewed and compared to other documents produced.

Subject to and without waiving said reservation of rights, Plaintiff identify the

following:

1.	Dr. Stephanie L. Wick 1506 Browning Place, Suite 107 Manhattan, KS 66502	Will testify as an expert on loss and grief. Her expert opinions are set forth in her Report and Affidavit which is being served upon Defendants' counsel this date.
2.	Michelle D. Beach Michelle Beach Consulting, LLC 1594 E State Highway CC Pleasant Hope, Missouri 65725	Will testify regarding the Collisions Analysis Report prepared analyzing the crash and her opinions regarding the scene and what the crash data from the vehicle driven by Ryan Fulcher depicts. Her expert opinions are set forth in her Affidavit and its exhibits which is being served upon Defendants' counsel this date.
3.	William Reece 21235 W 8 th Street Sand Springs, OK 74063	Will testify as to available safe parking on Cimarron Turnpike and analysis of Defendant Awad's driving history. His expert opinions are set forth in his Report which is being served upon Defendants' counsel this date.
4.	Mike Napier, Sr. 530 Forest Hill Road Macon, GA 31210	Will testify as an expert witness as a Commercial Motor Vehicle setting His expert opinions are set forth in his Expert Report of Michael K. Napier, Sr. which is being served upon Defendants' counsel this date.

Respectfully submitted,

s/Michael D. Denton, Jr.

Michael D. Denton, Jr., OBA # 13939
DENTON LAW FIRM
925 West State Highway 152
Mustang, Oklahoma 73064
Telephone: (405) 376-2212
Facsimile: (405) 376-2262
michael@dentonlawfirm.com
ATTORNEY FOR PLAINTIFF
RYAN FULCHER

-and-

Matthew L. Bretz
BRETZ & YOUNG, L.L.C.
3 Compound Drive
P.O. Box 1782
Hutchinson, KS 67504-1782
Telephone: (620) 662-3435
Facsimile : (620) 662-3445
Matt@byinjurylaw.com
ATTORNEY FOR PLAINTIFFS
THE ESTATE OF LAURA RATLEY,
ROBERT RATLEY, AMY RATLEY,
AND LEAH RATLEY

-and-

JAMES V. MURRAY, OBA # 11448
311 South Duck Street, P.O. Box 2224
Stillwater, OK 74076-2224
(405) 377-7000 Telephone
(405) 377-7009 Facsimile
jvm@jvmlaw.com
ATTORNEY FOR THE ESTATE OF
REBECCA FULCHER, JOHN
FULCHER AND AMY FULCHER